

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on
behalf of all other similarly situated,

Plaintiff,

V.

BELKIN INTERNATIONAL, INC.,

Defendant.

Case No. 1:22-cv-06918

Hon. Franklin U. Valderrama

**DEFENDANT BELKIN INTERNATIONAL, INC.'S SECOND SET OF
REQUESTS FOR THE PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, defendant Belkin International, Inc., (“***Belkin***”), by and through its undersigned counsel, hereby propounds its Second Set of Requests for the Production of Documents (the “***Requests for Production***” or “***Requests***”) to plaintiff Dennis Gromov (“***Plaintiff***”), and requests that plaintiff produce or make available for inspection and copying the documents described herein within 30 days of service.

DEFINITIONS

1. The terms “you” and “your” shall refer to Plaintiff Dennis Gromov.
2. The term “Complaint” shall refer to the complaint that you filed in this Action.

INSTRUCTIONS

1. In responding to these document Requests, you shall produce separately all documents or materials available at the time of responding or which can be located or discovered by reasonably diligent efforts.

2. If you claim any form of privilege or any other objection, whether based on statute, common law or otherwise as a ground for not producing any requested document, please furnish a list identifying each document for which the privilege or other objection is claimed together with the following information: date, sender, recipient, persons to whom copies were furnished together with their job titles, subject matter, basis on which privilege or other objection is claimed and the number of each Request to which such document responds. If you claim privilege or any other objection with regard to only part of a document, produce the part to which there is no objection.

3. Unless words or terms have been given a specific definition herein, each word or term used herein shall be given its usual and customary dictionary definition except where such words have a specific custom and usage definition in the relevant trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware. In construing the Requests herein: (i) the singular shall include the plural and the plural shall include the singular; and (ii) a masculine, feminine or neuter pronoun shall not exclude the other genders, all to the end that the interpretation applied results in the more expansive production.

4. In making production, produce all documents as kept in the ordinary course. Your production should include all responsive documents from all e-mail addresses that you used during the relevant time period.

DOCUMENTS REQUESTED

1. Please produce for inspection and testing the Belkin Pocket Power 10000 that you allege in the Complaint that you purchased.

2. Please produce for inspection and testing the Samsung Galaxy S6 Edge that you identified in your discovery responses.

Dated: June 9, 2023

Respectfully submitted,

By: /s/ Edward Totino

Edward Totino (*admitted pro hac vice*)

Nancy Nguyen Sims (*admitted pro hac vice*)

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